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*Bankruptcy Counsel for Lehman Brothers Equity/
Debt Securities Litigation Lead Plaintiffs*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., et
al.

Debtors.

Chapter 11

Case No. 08-13555(JMP)

(Jointly Administered)

**OBJECTION OF LEHMAN BROTHERS EQUITY/DEBT SECURITIES
LITIGATION LEAD PLAINTIFFS TO THE MOTION OF THE AD HOC
GROUP OF LEHMAN BROTHERS CREDITORS PURSUANT TO SECTIONS
105(A) AND 1109(B) OF THE BANKRUPTCY CODE AND BANKRUPTCY
RULES 2019 AND 7026 TO ESTABLISH DISCLOSURE PROCEDURES**

**TO THE HONORABLE JAMES M. PECK,
UNITED STATES BANKRUPTCY JUDGE:**

1. Lehman Brothers Equity/Debt Securities Litigation Lead Plaintiffs
("Lead Plaintiffs"), by and through their undersigned counsel, submits this objection (the
"Objection") to the *Motion of the Ad Hoc Group of Lehman Brothers Creditors Pursuant
to Sections 105(a) and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2019 and*

7026 to Establish Disclosure Procedures (Doc. No. 17014) (the "Motion"). In support of this Objection, Lead Plaintiffs respectfully state as follows:

2. Lead Plaintiffs are a creditor in these chapter 11 cases and a participant in the plan discovery process. Many other parties have filed objections to the Motion (collectively, the "Disclosure Objections").

3. As set forth in the Disclosure Objections, the relief requested by the Motion is inconsistent with, and contrary to, the provisions of Bankruptcy Rule 2019. For this reason, and for the reasons set forth in the Disclosure Objections, Lead Plaintiffs object to the Motion.

WHEREFORE, Lead Plaintiffs request that this Court deny the Motion, and provide such further relief as is just.

Dated: June 8, 2011

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By: /s/ Paul Kizel

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